



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 31, 2016

BY ECF and EMAIL

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Steven Brown,
16 Cr. 436 (KMW)**

Dear Judge Wood:

The Government respectfully submits this letter in response to the defendant's letter dated August 25, 2016, which requests (1) a modification of his current bail conditions that would allow travel throughout the continental United States; and (2) approval for an upcoming trip to Europe, including stops in England, France, Spain, and the Czech Republic. (Dkt. No. 27). As noted in that letter, the Government has consented to the modification of bail conditions with respect to domestic travel but has opposed the request for international travel based on the reasons previously articulated at the bail argument before Magistrate's Court at the time of the defendant's initial presentment.

With respect to the latter request, the defendant has cited his need to participate in "site selection, contract closing, casting, scouting, screening, promotional and filming obligations" for a number of film projects including "Ghoul," "Kajinek," "Warriors in Prague," "Kidnap," and "Dance Angels." Based on information found in publically available databases, the Government has found the following: (1) "Ghoul" appears to have been completed and was released in the Czech Republic and the United States well over a year and half ago in the beginning of 2015 (*see* http://www.imdb.com/title/tt3101132/releaseinfo?ref_=tt_ov_inf); (2) "Kajinek" is likewise completed and was released in various European cities in 2010 (*see* http://www.imdb.com/title/tt1573109/releaseinfo?ref_=tt_ov_inf); (3) "Dance Angels" appears to have been released at the beginning of this month (*see* http://www.imdb.com/title/tt4520292/releaseinfo?ref_=tt_ov_inf); and (4) "Kidnap" appears to be in post-production with release scheduled for later this year in the United States and the Netherlands (*see* http://www.imdb.com/title/tt1458169/?ref_=nv_sr_1). There is no record in the database for "Warriors in Prague." Given the status of these films, the Government does not understand why the defendant's presence is required to participate in "site selection, contract closing, casting, scouting, screening, promotional and filming obligations." Therefore, the Government respectfully requests that the Court require the defendant to provide additional

information as to the specific nature of his obligations with respect to these films and why they require his presence abroad prior to ruling on his request.

Very truly yours,

PREET BHARARA
United States Attorney

By: 

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cc: Walter Mack, Esq. (by ECF and email)